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VIA ECF

October 20, 2021

Hon. Steven I. Locke
United States Magistrate Judge
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: Cecil Thomas, et al. v. TXX Services, Inc., et al.
Civil Action No. 2:13-CV-02789-SIL**

Dear Judge Locke:

We represent the Plaintiffs in the above-referenced action. We write on behalf of all parties, in accordance with Section 2.B of Your Honor's Individual Motion Practices, to respectfully request an adjournment of the status conference currently scheduled for October 27, 2021, at 11:30 a.m. Good cause exists to adjourn the conference, for the following reason.

On August 30, 2021, the parties engaged in a first full day of mediation before nationally renowned mediator Michael Dickstein of Dickstein Dispute Resolution. While the parties did not reach an agreement that day, they agreed to continue to participate in the mediation process after an additional (and substantial) exchange of computerized data and other information, with a second day of mediation scheduled for October 21, 2021. Given the volume of data to be produced, and the fact that Defendants are continuing to work diligently to compile that data, the parties agreed to adjourn the second day of mediation to November 11, 2021.

As noted, all parties consent to this request. There has been one prior adjournment of the conference, to accommodate the original (October 21) date of the second mediation session (*see* ECF No. 272 and electronic order dated Sept. 3, 2021). Accordingly, the parties respectfully request that the status conference with Your Honor be rescheduled to a date and time of the Court's convenience after November 11, 2021. The parties will immediately advise the Court if the mediation results in an agreement to resolve this matter.

Respectfully submitted,

/s/ Denise A. Schulman
Denise A. Schulman

cc: All counsel